

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

EDUCATION CORPORATION OF )  
AMERICA, VIRGINIA COLLEGE, )  
LLC, and NEW ENGLAND COLLEGE )  
OF BUSINESS AND FINANCE, LLC, )  
                                  )  
                                 Plaintiffs, )  
v.                               )      Case Number: 2:18-CV-01698-ACK  
                                  )  
UNITED STATES DEPARTMENT OF )  
EDUCATION and BETSY DEVOS, )  
in her official capacity as Secretary of )  
Education,                      )  
                                 Defendants. )

**MOTION AND APPLICATION FOR *PRO HAC VICE* ADMISSION OF  
EMMANUELLE M. VERDIEU**

Pursuant to L.R. 83.1, Sara Zampierin, counsel for *Amici Curiae*, the Southern Poverty Law Center and Project on Predatory Student Lending, move this Court for the *pro hac vice* admission of Emmanuelle M. Verdieu to appear as counsel for *amici* in this case.

Ms. Verdieu is not a member of the Alabama bar or the bar of this Court. She is a member of the state bar of the Commonwealth of Massachusetts. Counsel attaches a recent certificate of good standing issued for Ms. Verdieu. Counsel also attaches a declaration by Ms. Verdieu attesting to the facts required by L.R. 83.1. Sara Zampierin, who is signing this Motion, also represents *amici* and has agreed to associate with Ms. Verdieu as local counsel in this matter.

For these reasons, Counsel respectfully requests that this Court grant  
Emmanuelle Verdieu leave to appear *pro hac vice* in the above-captioned matter.

Dated: November 5, 2018.

Respectfully submitted,

/s/ Sara Zampierin

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**Counsel for Amici Curiae**

**CERTIFICATE OF SERVICE**

I certify that on November 5, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notice of such filing to all parties.

/s/ Sara Zampierin  
Sara Zampierin